

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	X	
	:	
	:	Chapter 11
	:	
BIG LOTS, INC., <i>et al.</i> , <sup>1</sup>	:	Case No. 24-11967-JKS
	:	
Debtors.	:	(Jointly Administered)
	X	

**NOTICE OF RECLAMATION DEMAND  
OF RAYMOND STORAGE CONCEPTS, INC.**

PLEASE TAKE NOTICE that Raymond Storage Concepts, Inc. (“**Raymond Storage**”) hereby files this notice (the “**Notice**”) of its delivery of its written demand for reclamation pursuant to § 546(c) of Title 11 of the United States Code (the “**Bankruptcy Code** and/or other applicable law (the “**Reclamation Demand**”) on Big Lots, Inc. and its affiliated debtors (collectively, the “**Debtors**”) in order to reclaim all goods and products (collectively, the “**Goods**”) sold and delivered by Raymond Storage in the ordinary course of its business on credit to, and received by, one or more of the Debtors within forty-five (45) days prior to the commencement of the Debtors’ chapter 11 cases (the “**Reclamation Period**”) on September 9, 2024 (the “**Petition Date**”) when the Debtors were insolvent.

PLEASE TAKE FURTHER NOTICE that a true and correct copy of the Reclamation Demand is attached hereto as **Exhibit A** and is incorporated herein by this reference. The Reclamation Demand identifies the Goods which Raymond Storage sold and delivered to one or

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal identification number, are: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores – PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores – CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the Debtors’ corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

more of the Debtors in the ordinary course of business within forty-five (45) days prior to the Petition Date together with supporting documentation evidencing the delivery of the Goods. The total invoice price of the Goods subject to the Reclamation Demand is \$63,702.20.

**PLEASE TAKE FURTHER NOTICE** that Raymond Storage hereby demands that to the extent the Debtors still possess or control the Goods, the Debtors segregate the Goods from any other property of the Debtors' respective bankruptcy estates pending further final order or judgment of a court of competent jurisdiction, after notice and a hearing, and to return the Goods to Raymond Storage as required by applicable law. Raymond Storage hereby asserts any claim relating to any right of reclamation and its rights, claims, and remedies in and to the Goods. Raymond Storage does not consent to the Debtors' use, sale, or lease of the Goods, or any proceeds of the Goods, or the imposition or the granting of a lien on the Goods, or any proceeds of the Goods, including for the purposes of §§ 363 and 364 of the Bankruptcy Code. Raymond Storage does not waive or otherwise relinquish any right by demanding reclamation of the Goods, or filing and serving this notice. Neither demanding reclamation of the Goods, nor the filing and serving of this notice, shall prejudice any right of Raymond Storage, such as any right to the allowance and payment of any amount pursuant to § 503 of the Bankruptcy Code. Raymond Storage reserves the right to amend or otherwise modify the Reclamation Demand, or any claim relating to any right of reclamation, or otherwise, such as by filing and serving another notice of reclamation or an adversary proceeding.

Dated: September 24, 2024  
Lisle, Illinois

SWANSON, MARTIN & BELL, LLP

By: /s/ Charles S. Stahl, Jr.  
Charles S. Stahl, Jr.  
2525 Cabot Drive, Suite 204  
Lisle, IL 60532  
T: 630-780-8472

F: 630-799-6901

Email: [cstahl@smbtrials.com](mailto:cstahl@smbtrials.com)

# **EXHIBIT A**



**SWANSON, MARTIN & BELL, LLP**

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ATTORNEYS AT LAW  
2525 CABOT DRIVE • SUITE 204  
LISLE, ILLINOIS 60532  
(630) 799-6900 • FAX (630) 799-6901  
Writer's Direct Dial: (630) 780-8472

September 24, 2024

**VIA EMAIL**

**(to the addressee and all persons on the attached Service List)**

Big Lots, Inc.  
Attn: Mr. Jonathan E. Ramsden  
Executive Vice President  
Chief Financial and Administrative Officer  
4900 East Dublin Granville Road  
Westerville, OH 43081  
jramsd@biglots.com

Re: Big Lots, Inc., *et al.* (collectively, “**Debtors**”)  
Lead Case No. 24-11967 (the “Ch. 11 Cases”)

Reclamation Demand of Raymond Storage Concepts, Inc. (“**Raymond Storage**”)

Dear Mr. Ramsden:

We represent Raymond Storage in the Ch. 11 Cases. On September 9, 2024 (the “**Petition Date**”), Debtors commenced the Ch. 11 Cases in the United States Bankruptcy Court for the District of Delaware, thereby indicating Debtors were insolvent within the meaning of § 101(32) of the Bankruptcy Code as of the Petition Date.

Raymond Storage hereby provides written notice of its demand for reclamation of goods sold and delivered by Raymond Storage to one or more of the Debtors (the “**Goods**”). Pursuant to § 546(c) of the Bankruptcy Code, Raymond Storage hereby reclaims all Goods sold on credit in the ordinary course of its business and delivered to and received by one or more of the Debtors within forty-five (45) days of the Petition Date on or about August 5, 2024. The Goods are described in the invoice and supporting documentation attached hereto as **Exhibit 1**. The value of the Goods totals at least \$63,702.20.

SWANSON, MARTIN & BELL, LLP

Big Lots, Inc. (and all persons on the attached Service List via email)  
Attn: Mr. Jonathan E. Ramsden  
September 24, 2024  
Page 2

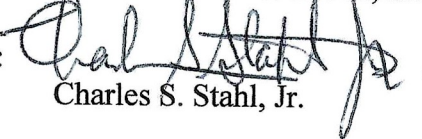
Raymond Storage reserves all of its rights with respect to the Goods, including, but not necessarily limited to (1) the right to be paid in the ordinary course of business as a post-petition creditor to the extent the Goods were received by any of the Debtors on or after the Petition Date; (2) the right to assert an administrative priority claim pursuant to § 503(b)(9) of the Bankruptcy Code if and as applicable; (3) the right to assert a “new value” defense to any preference demand asserted against it in the Ch. 11 Cases; (4) the right to seek payment from any non-debtor parties that have the use and benefit of the Goods; (5) the right to setoff under applicable law; (6) the right to file additional demands or claims, including a proof of claim, in the Ch. 11 Cases; and (7) the right to amend this demand and any corresponding notice filed in the Ch. 11 Cases.

Please contact the undersigned to arrange for the immediate return of the Goods. The Goods shall not be used for any purpose whatsoever except as specifically authorized by the court presiding in the Ch. 11 Cases after notice to Raymond Storage and a hearing. Absent such authority or Raymond Storage’s written consent in its sole discretion, Debtors do not have Raymond Storage’s permission, consent, or authorization to use the Goods that are subject to this reclamation demand because any such use would cause the Goods to depreciate in value.

Raymond Storage expressly reserves all of its rights under the Bankruptcy Code and applicable law.

Very truly yours,

SWANSON MARTIN & BELL, LLP

By:   
Charles S. Stahl, Jr.

Attachment: Exhibits 1

**Service List (Debtors' Proposed Counsel)**

Robert J. Dehney, Sr., Esq.  
Andrew R. Remming, Esq.  
Daniel B. Butz, Esq.  
Tamara K. Mann, Esq.  
Sophie Rogers Churchill, Esq.  
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tmann@morrisnichols.com  
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stephen.piraino@davispolk.com  
ethan.stern@davispolk.com

# **EXHIBIT 1**



**STORAGE CONCEPTS**

5480 Creek Road, Cincinnati, OH 45242  
 Tel: (513) 891-7290  
 Fax: (513) 891-7299

4333 Directors Boulevard, Groveport, OH 43125  
 Tel: (614) 275-3494  
 Fax: (614) 275-3493

11921 Carrier Court, Louisville, KY 40299  
 Tel: (502) 491-2237  
 Fax: (502) 499-0240

Account#	Order #	Brc	Sls
BIGLOTS	438441	200	2MQ

**I N V O I C E**

Date	Invoice #	Page
08-15-24	20708982	1

Sold To: 002  
 Big Lots Inc  
 450 Phillipi Rd  
 DC 890 Maintenance  
 Columbus OH 43228

Ship To:  
 Big Lots Inc  
 500 Phillipi Rd  
 DC 890 Maintenance

Columbus OH 43228  
 Ship Via B/W

Entered By kristym	Customer Purchase Order 461673948	Customer Contact DWIGHT COLLIER	Ord Date 08-09-24
Model	Serial Number	Equip ID	Customer Job # 333-2022
			Customer Phone # 1 (614) 278-6800

Ord	Ship	B/O Part Number	Description	Unit Price	UM	Extended
1		id# 425-0086248	SELL PRICE			30,157.10
		model-425-C35STT	serial#-425-24-0086248			
		STAND-UP COUNTERBALANCE TRUCK				
1		id# 425-0086264	SELL PRICE			30,157.10
		model-425-C35STT	serial#-425-24-0086264			
		STAND-UP COUNTERBALANCE TRUCK				
1		id# 425-0086246	SELL PRICE			30,157.10
		model-425-C35STT	serial#-425-24-0086246			
		STAND-UP COUNTERBALANCE TRUCK				
1		id# 425-0086249	SELL PRICE			30,157.10
		model-425-C35STT	serial#-425-24-0086249			
		STAND-UP COUNTERBALANCE TRUCK				
4		INSTALLATION NEW EQUIPMENT	800.00			3,200.00
4		SHIPPING & HANDLING	894.00			3,576.00
1		50 PERCENT DEPOSIT- INV# 20682074	60,314.20-			60,314.20-
		(4) RAYMOND 425-C35TT STAND-UP COUNTERBALANCE TRUCKS				

PLEASE REMIT PAYMENT TO: 5480 CREEK RD  
 CINCINNATI, OH 45242

Total Invoice  
 Due By:

Continued

THANK YOU FOR CHOOSING RAYMOND STORAGE CONCEPTS,  
 INC. FOR ALL YOUR MATERIAL HANDLING NEEDS.

## STORAGE CONCEPTS

5480 Creek Road, Cincinnati, OH 45242  
Tel: (513) 891-7290  
Fax: (513) 891-7299

4333 Directors Boulevard, Groveport, OH 43125  
Tel: (614) 275-3494  
Fax: (614) 275-3493

11921 Carrier Court, Louisville, KY 40299  
Tel: (502) 491-2237  
Fax: (502) 499-0240

Account#	Order #	Brc	Sls
BIGLOTS	438441	200	2MQ

### I N V O I C E

Date	Invoice #	Page
08-15-24	20708982	2

Sold To: 002  
Big Lots Inc  
450 Phillipi Rd  
DC 890 Maintenance  
Columbus OH 43228

Ship To:  
Big Lots Inc  
500 Phillipi Rd  
DC 890 Maintenance

Columbus OH 43228  
Ship Via B/W

Entered By kristym	Customer Purchase Order 461673948	Customer Contact DWIGHT COLLIER	Ord Date 08-09-24
Model	Serial Number	Equip ID	Customer Job # 333-2022
			Customer Phone # 1 (614) 278-6800

Ord	Ship	B/O Part Number	Description	Unit Price	UM	Extended
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1		50 PERCENT DEPOSIT- INV# 20682074	NEW TRUCK INSTALLATION	1,600.00-		1,600.00-
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1		50 PERCENT DEPOSIT- INV# 2068207	FREIGHT	1,788.00-		1,788.00-
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Sub Total 63,702.20

NR Sales Tax Number - 0.00

PLEASE REMIT PAYMENT TO: 5480 CREEK RD  
CINCINNATI, OH 45242

Total Invoice  
Due By:  
10/14/24

63,702.20

THANK YOU FOR CHOOSING RAYMOND STORAGE CONCEPTS,  
INC. FOR ALL YOUR MATERIAL HANDLING NEEDS.



# RAYMOND

## STORAGE CONCEPTS

5480 Creek Road  
Cincinnati, OH 45242  
Tel: (513) 891-7290  
Fax: (513) 891-7299

4333 Directors Boulevard  
Groveport, OH 43125  
Tel: (614) 275-3494  
Fax: (614) 275-3493

11921 Carrier Court  
Louisville, KY 40299  
Tel: (502) 491-2237  
Fax: (502) 499-0240

BIG LOTS  
500 PHILLIPI RD

COLUMBUS, OH 43228

Branch 200 Workorder 513869

Unit

Cust # SALES200 (cust)

Mfr Model Serial Number

RA 4250 425-24-0086249

Meters 1 0 0 0 0

8/5/2024 5:21:52 PM

☒ Active

Repair Work Order

Seg 000 Gen

Qty	Parts Used	Work Description
3.00		unloaded the truck installed the battery moved and remounted the battery connector fabricated a new pos battery cable from the battery connector to TP1 performed ops checks ready for service INSTALL/STANDUP/LAYDOWN

☒ OK

☒ Adjustments Made

☐ Repair Needed

☒ Repair Made

☐ NA Not Applicable

☒ Active

Authorized Signature

ralph gates

Thank You for your business; your technician was:

CHANDLER NEWTON

Phone 614-275-3494

Cust PO POW# 333-2022

# RAYMOND

## STORAGE CONCEPTS

5480 Creek Road  
Cincinnati, OH 45242  
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Groveport, OH 43125  
Tel: (614) 275-3494  
Fax: (614) 275-3493

11921 Carrier Court  
Louisville, KY 40299  
Tel: (502) 491-2237  
Fax: (502) 499-0240

BIG LOTS  
500 PHILLIPS RD

COLUMBUS, OH 43228

Branch 200 Workorder 513866  
Unit  
Cust # SALES200 (cust)  
Mfr Model Serial Number  
RA 4250 425-24-0086248

Meters 1 0 0 0 0

8/5/2024 5:21:47 PM

☒ Active

Repair Work Order

Seg 000 Gen

Qty	Parts Used	Work Description
3.00		unloaded the truck installed the battery moved and remounted the battery connector fabricated a new pos battery cable from the battery connector to TP1 performed ops checks ready for service INSTALL/STANDUP/LAYDOWN

Seg 040 Gen TRIP CHARGE

Qty	Parts Used	Work Description
		ntc TRIP CHARGE TRIP CHARGE

☒ OK ☐ A Adjustments Made ☐ O Repair Needed ☐ R Repair Made

☐ NA Not Applicable

☒ Active

Authorized Signature

ralph gates



Thank You for your business; your technician was:

CHANDLER NEWTON

Phone 614-275-3494

Cust PO POW# 333-2022

# RAYMOND

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Fax: (614) 275-3493

11921 Carrier Court  
Louisville, KY 40299  
Tel: (502) 491-2237  
Fax: (502) 499-0240

BIG LOTS  
500 PHILLIPS RD

COLUMBUS, OH 43228

Branch	200	Workorder	513867
Unit			
Cust #	SALES200	(cust)	
Mfr	Model	Serial Number	
RA	4250	425-24-0086264	

Meters 1 0 0 0 0

8/5/2024 5:21:50 PM

☒ Active

Repair Work Order

Seg 000 Gen

Qty	Parts Used	Work Description
3.00		unloaded the truck installed the battery moved and remounted the battery connector fabricated a new pos battery cable from the battery connector to TP1 performed ops checks ready for service INSTALL/STANDUP/LAYDOWN

Seg 040 Gen TRIP CHARGE

Qty	Parts Used	Work Description
		ntc

☒ OK
 ☒ Adjustments Made
 ☐ Repair Needed
 ☒ Repair Made

☐ NA Not Applicable

☒ Active

Authorized Signature

ralph gates



Thank You for your business; your technician was:

CHANDLER NEWTON

Phone 614-275-3494

Cust PO POW# 333-2022



# RAYMOND STORAGE CONCEPTS

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Fax: (614) 275-3493

11921 Carrier Court  
Louisville, KY 40299  
Tel: (502) 491-2237  
Fax: (502) 499-0240

BIG LOTS  
500 PHILLIP RD

COLUMBUS, OH 43228

Branch 200 Workorder 513868

Unit

Cust # SALES200 (cust)

Mfr Model Serial Number

RA 4250 425-24-0086246

Meters 1 0 0 0 0

8/5/2024 5:21:51 PM

☒ Active

## Repair Work Order

### Seg 000 Gen

Qty	Parts Used	Work Description
3.00		unloaded the truck installed the battery moved and remounted the battery connector fabricated a new pos battery cable from the battery connector to TP1 performed ops checks ready for service INSTALL/STANDUP/LAYDOWN

### Seg 040 Gen TRIP CHARGE

Qty	Parts Used	Work Description
		ntc

☒ OK

☐ A Adjustments Made

☐ O Repair Needed

☐ R Repair Made

☐ NA Not Applicable

☒ Active

Authorized Signature

ralph gates

Thank You for your business; your technician was:

CHANDLER NEWTON

Phone 614-275-3494

Cust PO POW# 333-2022

